

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

CYNOSURE, LLC, et al.;

Plaintiffs,

v.

REVEAL LASERS LLC., et al.;

Defendants.

Civil Action No. 1:22-CV-11176-PBS

**PLAINTIFFS' MOTION FOR ENTRY OF JUDGMENT IN FAVOR OF PLAINTIFFS  
ON THEIR CHAPTER 93A CLAIM, FOR PREJUDGMENT INTEREST, AND FOR  
ATTORNEYS' FEES AND COSTS**

Pursuant to the Court's October 11, 2024 Order (ECF No. 663), Plaintiffs Cynosure, LLC and Lotus Parent, Inc. (collectively, "Cynosure") respectfully move this Court for an order (i) finding Defendants Reveal Lasers LLC, Reveal Lasers LTD, Robert Daley, and Christopher Chambers liable under Mass. Gen. Laws ch. 93A ("Chapter 93A"); (ii) finding that Defendants Reveal Lasers LLC, Reveal Lasers LTD, Robert Daley, and Christopher Chambers' violations of Chapter 93A were willful or knowing so as to warrant multiple damages of no less than double (but no more than treble) Cynosure's actual damages of \$25,000,000 (i.e., doubled to \$50,000,000 or trebled to \$75,000,000), as permitted by statute; (iii) finding that Cynosure is entitled to its attorneys' fees and costs (to be subsequently briefed on a schedule set by the Court); (iv) fixing the amount of prejudgment interest to which Cynosure is entitled in its judgment; and (v) granting such other relief as the Court finds just and appropriate.

The grounds for this Motion are fully set forth in the accompanying Memorandum of Law and the Declaration of Bruce McFarlane, filed this date in support of this Motion.

**REQUEST FOR ORAL ARGUMENT**

Cynosure respectfully requests oral argument on this Motion.

Dated: October 25, 2024, 2024

Respectfully submitted,

CYNOSURE, LLC  
LOTUS PARENT, INC.

By their attorneys,

/s/ Dipanwita Deb Amar

Dipanwita Deb Amar

Joseph Farris

Matthew Diton

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**CERTIFICATE OF COMPLIANCE**

In accordance with Local Rule 7.1, I hereby certify that counsel for Plaintiffs have conferred with counsel for Defendants and have attempted in good faith to resolve or narrow the areas of disagreement to the greatest possible extent before filing this Motion.

/s/ Dipanwita Deb Amar

Dipanwita Deb Amar

**CERTIFICATE OF SERVICE**

I, Dipanwita Deb Amar, hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing on October 25, 2024.

/s/ Dipanwita Deb Amar  
Dipanwita Deb Amar